



LIDA M. BANNINK, being first duly sworn, on oath deposes and states as follows:

1. I am attorney licensed in the State of Wisconsin.
2. I am one of the attorneys representing Plaintiffs, M.J.J. and J.K.J., in the above-captioned matter.
3. I make this Affidavit in support of Plaintiff's Response to Defendant Polk County's Motion for Summary Judgment.
4. Attached are true and correct copies of the following documents:

EXHIBIT A: Plaintiffs First Set of Written Interrogatories and Request for Production of Documents to Polk County served April 5, 2016.

EXHIBIT B: Defendant Polk County Sheriff Department's Response to responses to Plaintiffs First Set of Written Interrogatories and Request for Production of Documents to Polk County dated May 12, 2016.

EXHIBIT C: Documents bates numbered PCJ 636-637, 628-631, 3569-3717, 3769-3778, 3779-3790, 3791-3800, 3801-3809, 3010-3817, 3818-3834, 4255-4257, 4706-4707 which were produced in response to Plaintiffs Discovery request dated May 12, 2016 from Polk County that are the only documents produced that are relevant to training at the Polk County jail.

EXHIBIT D: Documents bates numbered 3737-3768 which were produced in response to Plaintiffs Discovery Request dated May 12, 2016 from Polk County that are the only documents produced regarding the allegations of sexual harassment/assault by Jailer Alan Jorgensen.

EXHIBIT E: Exhibit 5 (Scott Nargis' documentation of discipline date April 22, 2011) from Scott Nargis' deposition taken on June 2, 2016.

EXHIBIT F: Exhibit 6 (Christensen's performance review dated October 6, 2011) from Scott Nargis' deposition taken on June 2, 2016.

EXHIBIT G: Documents bates numbered PCJ 3718-3736 which were produced in response to Plaintiffs Discovery request from Polk County that outline discipline Christensen received by Polk County.

EXHIBIT H: Exhibit 1 (Polk County Wisconsin Job Description) from Darryl Christensen's deposition taken on May 18, 2016.

- EXHIBIT I: Exhibit 12 (Polk County Jail Policy and Procedures Manual I-300 Inmate Rules) from Scott Nargis' deposition taken on June 2, 2016.
- EXHIBIT J: Exhibit 13 (Polk County Jail Policy and Procedures Manual I-100 Inmate Rights) from Scott Nargis' deposition taken on June 2, 2016.
- EXHIBIT K: Exhibit 14 (Polk County Jail Inmate Handbook) from Scott Nargis' deposition taken on June 2, 2016.
- EXHIBIT L: Polk County Jail Policy and Procedures Manual G-400 Library received from Polk County Sheriff's Department in Defendant Polk County Sheriff's Department Response to Plaintiff's First Set of Written Interrogatories and Request for Production of Documents dated May 12, 2016.
- EXHIBIT M: Polk County Jail Policy and Procedures Manual G-500 Exercise and Recreation received from Polk County Sheriff's Department in Defendant Polk County Sheriff's Department Response to Plaintiff's First Set of Written Interrogatories and Request for Production of Documents dated May 12, 2016.
- EXHIBIT N: Polk County Jail Policy and Procedures Manual C-900 Corrections Officer Post Orders received from Polk County Sheriff's Department in Defendant Polk County Sheriff's Department Response to Plaintiff's First Set of Written Interrogatories and Request for Production of Documents dated May 12, 2016.
- EXHIBIT O: Polk County Jail Policy and Procedures Manual C-902 Shift Supervisor Post Orders received from Polk County Sheriff's Department in Defendant Polk County Sheriff's Department Response to Plaintiff's First Set of Written Interrogatories and Request for Production of Documents dated May 12, 2016.
- EXHIBIT P: Polk County Jail Policy and Procedures Manual C-903 Master Control Post Orders received from Polk County Sheriff's Department in Defendant Polk County Sheriff's Department Response to Plaintiff's First Set of Written Interrogatories and Request for Production of Documents dated May 12, 2016.
- EXHIBIT Q: Polk County Jail Policy and Procedures Manual C-904 Floor Officer Post Orders received from Polk County Sheriff's Department in Defendant Polk County Sheriff's Department Response to Plaintiff's First Set of Written Interrogatories and Request for Production of Documents dated May 12, 2016.

EXHIBIT R: Polk County Jail Policy and Procedures Manual C-905 Secure Control Post Orders received from Polk County Sheriff's Department in Defendant Polk County Sheriff's Department Response to Plaintiff's First Set of Written Interrogatories and Request for Production of Documents dated May 12, 2016.

EXHIBIT S: Polk County Jail Policy and Procedures Manual C-906 Minimum Control Post Orders received from Polk County Sheriff's Department in Defendant Polk County Sheriff's Department Response to Plaintiff's First Set of Written Interrogatories and Request for Production of Documents dated May 12, 2016.

EXHIBIT T: Defendant Christensen's training certificates received from Polk County Sheriff's Department in Defendant Polk County Sheriff's Department Response to Plaintiff's First Set of Written Interrogatories and Request for Production of Documents dated May 12, 2016.

Dated: \_\_\_\_\_

7/29/2016

ECKBERG LAMMERS, P.C.

By: \_\_\_\_\_

Thomas J. Weidner (1082013)

Lida M. Bannink (1088518)

Attorneys for Plaintiff

430 Second Street

(715) 386-3733

[tweidner@eckbergglammers.com](mailto:tweidner@eckbergglammers.com)

[lbannink@eckbergglammers.com](mailto:lbannink@eckbergglammers.com)